

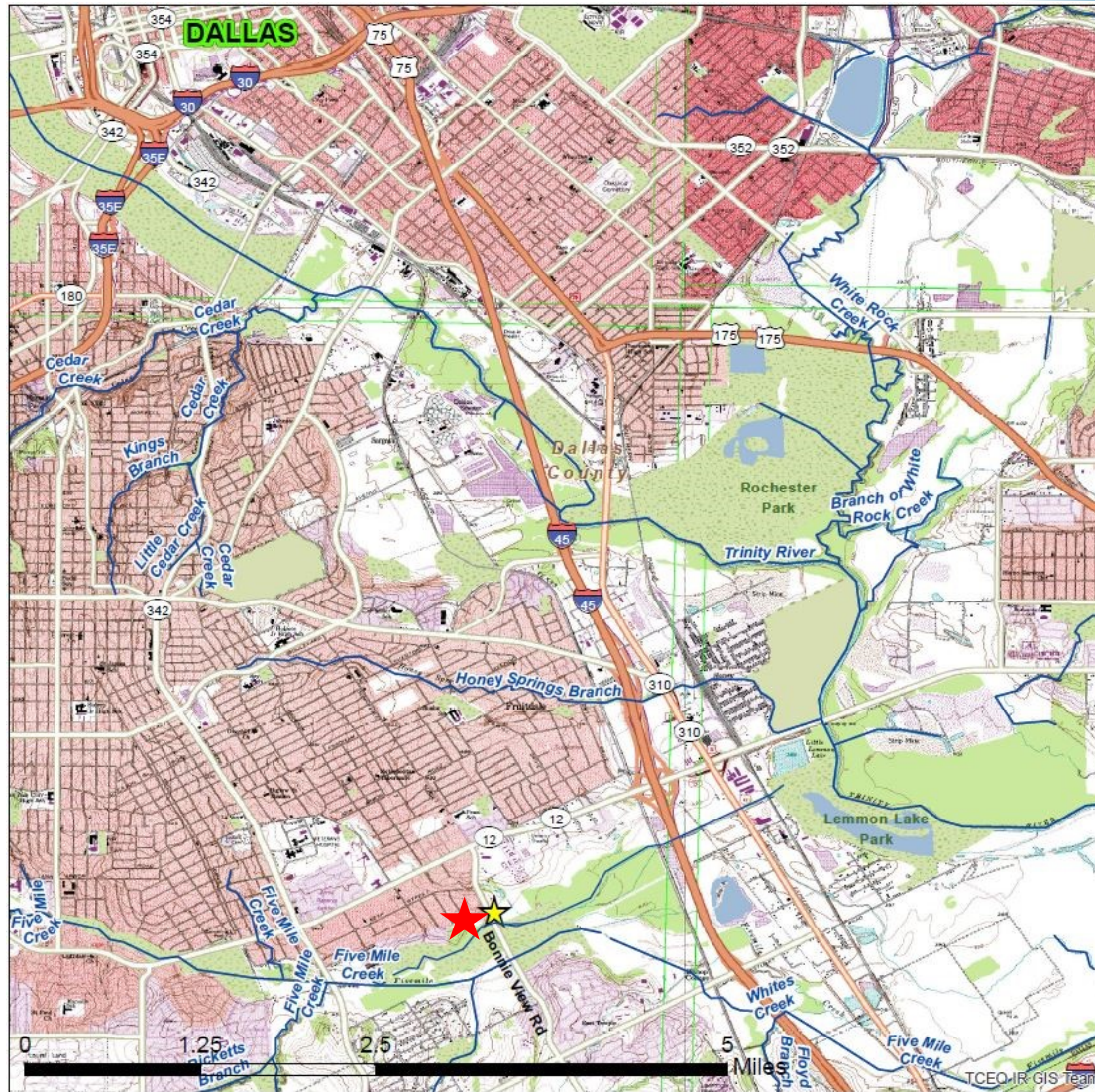
Lane Plating Works



**Site Assessment, Removal & Enforcement Update
August 11, 2016**

U.S. EPA Region 6

Site Location



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Operational History - Summary

- ▶ Operated as an electroplating facility for about 90 years.
- ▶ Primary activities
 - Hard Chromium Plating - Cadmium Plating
- ▶ Other activities
 - Black Oxide Coating - Machining/Grinding
 - Electroless Nickel Plating - Lead Melting Pot for Anode Repair

Enforcement/Investigation History

- ▶ Feb. 2010
 - Numerous violations noted during CEI conducted by TCEQ
- ▶ Jan. 2011
 - A follow-up CEI was conducted by TCEQ which noted many old violations as well as new violations
- ▶ July 2011
 - Agreed Order issued by TCEQ
 - Cease unauthorized discharges
 - Remediate contaminated soils
 - Pay a penalty of \$28,350

Enforcement/Investigation History (cont.)

- ▶ August to Nov. 2014
OSHA conducted several inspections
 - Numerous serious violations noted
 - Two willful violations noted
 - Cited Lane Plating for \$110,200 in January 2015

- ▶ Oct. 2014
Numerous violations noted during CEI and follow-up AO inspection conducted by TCEQ

- ▶ March 2015
TCEQ initiated enforcement actions against the facility

Enforcement/Investigation History (cont.)

- ▶ Nov. 2015 Additional inspections/investigations were conducted by TCEQ
- ▶ Dec. 2015 Lane Plating Works filed for bankruptcy
- ▶ Dec. 2015 TCEQ conducted a limited removal action
 - Lab-pack select chemicals in the facility lab
 - Pump waste/sludge from two on-site sumps (~8,000 gals)
 - Secure the facility

TCEQ Referral

- ▶ Jan. 2016 TCEQ referred the site to EPA's Emergency Management Branch in January 2016
- ▶ Feb. 2016 TCEQ requested EPA evaluate the site under the HRS in early-February 2016
- ▶ Feb. 2016 EPA authorized the TCEQ to evaluate the site under its PA/SI grant

Removal Assessment

- ▶ Site reconnaissance completed on March 23, 2016

- ▶ Field activities conducted April 12-13, 2016
 - Liquid waste sampling
 - Soil sampling (50-foot grids)

- ▶ Sample results
 - Liquid wastes are characteristically hazardous
 - Soils are contaminated predominantly with hex chrome and lead above EPA RSLs

Totes Containing Chromic Acid Wastes from Sumps



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Tank Containing Chromic Acid Wastes



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Sampling Grid – Main Plating Building



Grid = 50' x 50'

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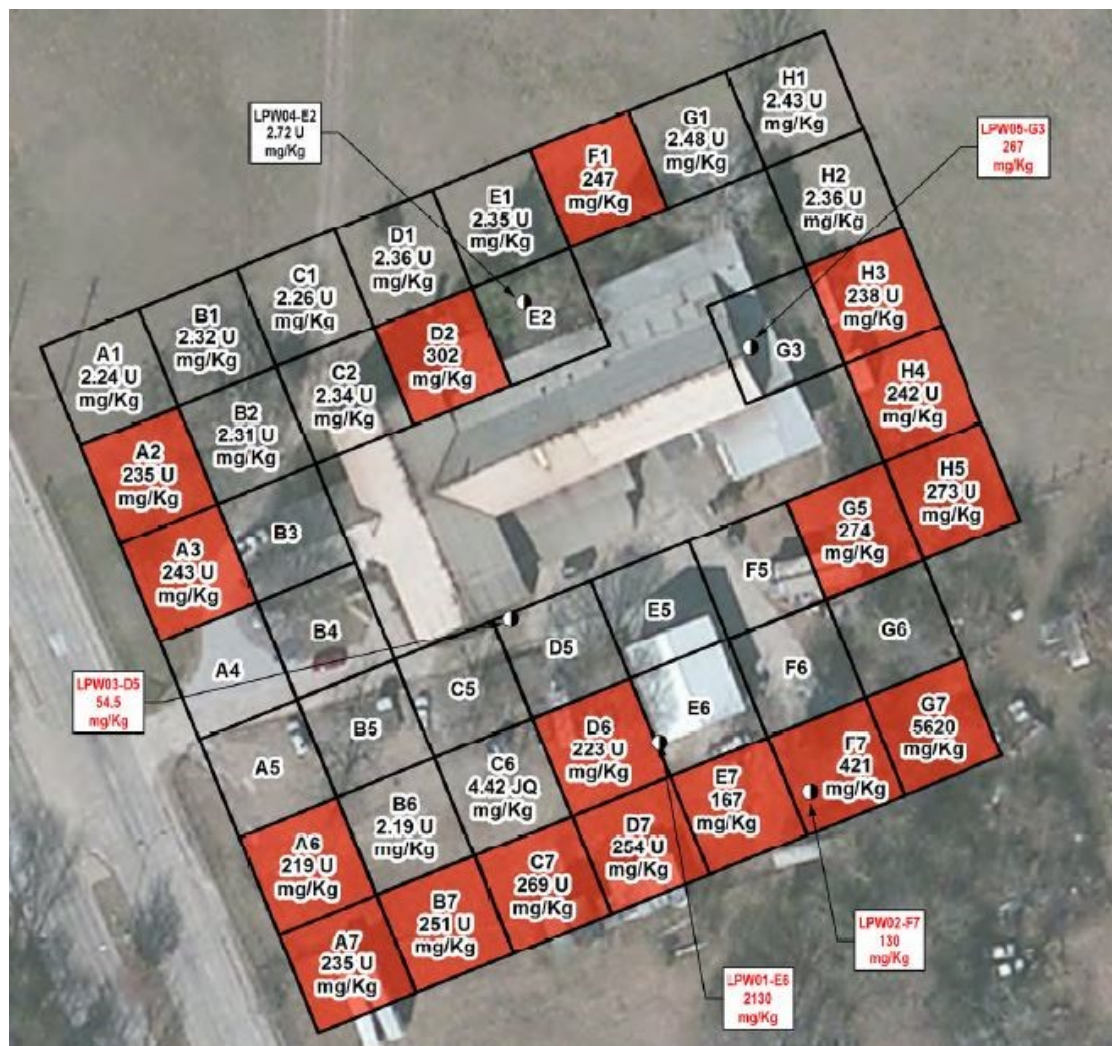


Soil Samples 0-6" > EPA RSL for Lead



EPA RSL for Lead
= 800 mg/kg (Ind)

Soil Samples 0-6" > EPA RSL for Hex Cr



EPA RSL for Hex Cr
= 6.3 mg/kg (Ind)

Preliminary Assessment

Site Visit/Field Reconnaissance conducted on Feb. 24, 2016

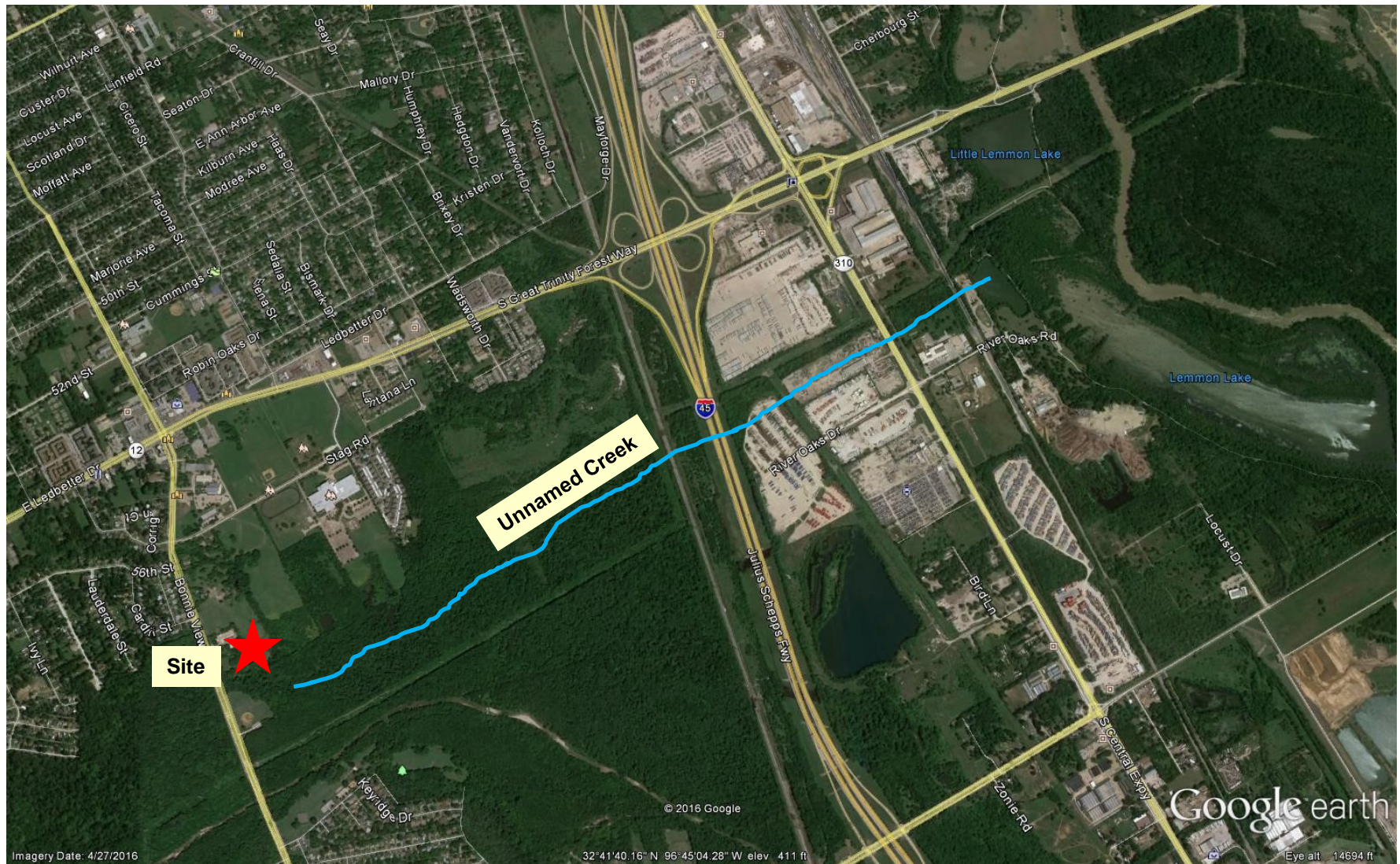
- Potential Sources
 - Contaminated soil
 - Containerized wastes
- Ground Water Pathway
 - Two on-site wells (impacted)
 - Only one well located within 1-mile – irrigation
- Soil Exposure Pathway
 - No on-site workers
 - No receptors located within 200-feet

Preliminary Assessment (cont.)

Site Visit/Field Reconnaissance conducted on Feb. 24, 2016

- Surface Water Pathway
 - No drinking water intakes within 15-mile TDL
 - Sensitive environments located within 15-mile TDL
(*Joppa/Lemon Lake Preserve and freshwater wetlands*)
- Air Pathway
 - 74 Residences within ¼-mile

SW Pathway Map



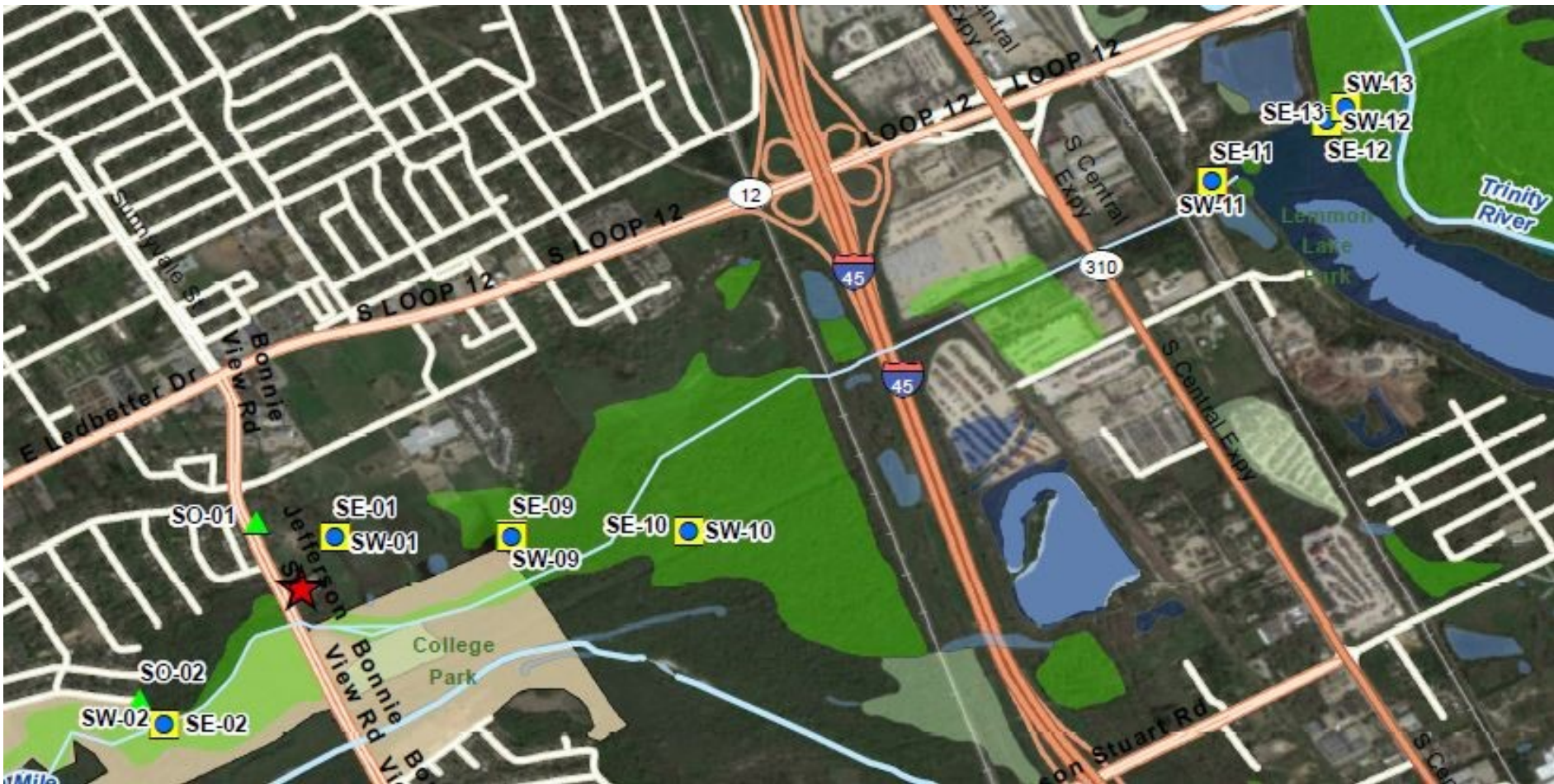
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Site Inspection

- ▶ Site Visit/Field Reconnaissance conducted on June 1, 2016
- ▶ Field Activities completed from July 18-21
 - Soil
 - Surface Water
 - Sediment
- ▶ Samples submitted to EPA Houston and CLP (CN only). Sample results are expected in early September

SI Sampling Map



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Site Assessment

► Conclusion

There appears to be a possibility for the site to score above a 28.5 based on an Observed Release to the Surface Water Pathway

► Recommendation

Focus on the Surface Water Pathway, by conducting a Site Inspection

Removal Actions will not impact ranking of site

Enforcement

- ▶ Two PRP's identified
 - Lane Plating Works, Inc. – Operator
 - Stag Management, Inc. – Owner
- ▶ Proof of Claim filed for Lane Plating Works bankruptcy case on 7/29

Next Steps

► Removal

- Seek approval for Removal Action to address the plating wastes and contaminated soils
- Further evaluation of Main Plating Building may be necessary

► Site Assessment

- Complete the SI report (analytical expected in early Sept.)
- Complete Quickscore

► Enforcement

- Review facility files/records located at the site